



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

Via Electronic Mail and U.S. Postal Service Mail

May 7, 2012

Mr. Brian Kelly
Chevron Business and Real Estate Services
145 South State College Boulevard, Suite 400
Brea, California 92821

Re: Polychlorinated Biphenyls Cleanup under the Toxic Substances Control Act
"Soil Management and Sample and Analysis Plan, Brea Birch Hills Golf Course,
2250 East Birch Street, Brea, California"

Dear Mr. Kelly:

Thank you for working with the U.S. Environmental Protection Agency, Region 9 ("EPA") to clean up soils contaminated with polychlorinated biphenyls ("PCBs") at the Brea Birch Hills Golf Course ("Site"), located at 2250 East Birch Street, Brea, California. Chevron's November 18, 2011 *"Soil Management and Sample and Analysis Plan"* ("SMSAP") along with subsequent Amendments outline a PCB remediation plan for the Site. This plan was prepared by URS Corporation ("URS") for the Chevron Land and Development Company ("Chevron"), which is supporting the Site owner, Union Oil Company of California.

EPA is hereby approving with conditions the Revised SMSAP (including Amendments #1 and #4) under the Toxic Substances Control Act ("TSCA") regulations in 40 C.F.R. § 761.61(c) for a risk-based cleanup. The Revised SMSAP is the risk-based disposal approval application ("Application") required in 761.61(c). Enclosure 1 contains the conditions of approval and Chevron must implement the Revised SMSAP as modified by EPA.

The Birch Hills Golf Course (Site) covers approximately 92 acres of land in Brea, California. It is divided roughly into Northern and Southern halves by a regional stormwater diversion channel called the Loftus Channel. From the 1950s to the 1990s, a Unocal Chemical Plant (a fertilizer production facility) operated on the southeastern quadrant of the Site. The footprint of the plant also extended further south of the Site into an area that was redeveloped into a shopping center. While an exact source for the PCB contamination is unknown, potential sources may include transformers, hydraulic equipment, and building materials.

Due to insufficient PCB analyses during closure and demolition of the plant that would have forewarned the presence of PCBs, contaminated soils were spread around the Site when the golf course was being developed in the 1990s. Aroclors 1254 and 1260 are the predominant Aroclors detected at the Site.

Due to the differing future use and activity patterns throughout the site, as well as the varied concentrations of contamination found during initial characterization, EPA has functionally divided the site into four distinct areas of investigation: Planning Areas 12A and 12B, and the Southwestern and Northern Golf Course. Planning Areas 12A and 12B will be redeveloped for residential use.

In the Revised SMSAP, Chevron/URS propose a cleanup goal of 7 ppm for all areas of the Site that will remain a golf course. However, Chevron/URS have proposed a new cleanup level through the submission of an amendment, and EPA is currently reviewing that document.

Overview of Activities

As modified by the conditions of approval, the Revised SMSAP includes the following activities for cleanup of PCB contamination:

- (1) Additional site characterization for PCBs
- (2) Excavation and off-site disposal of soils contaminated with PCBs over 50 ppm
- (3) Excavation of an area in the Northern Golf Course to be used as a Consolidation Area for contaminated soil and as a source of clean soil
- (4) Excavation and transfer of PCB contaminated soil to the Consolidation Area
- (5) Transfer of clean soils from the Northern Golf Course to Planning Area 12B
- (6) Cleanup verification sampling for all remedial excavations

Applicability of Conditional Approval

This conditional approval applies only to the areas addressed in the Revised SMSAP (including Amendments #1 and #4). Refer to Section C of the enclosed Approval for details. Under TSCA, EPA may require further characterization and cleanup of PCBs at the Site if new information during characterization, verification sampling, and/or future post-cleanup activities (such as redevelopment and post redevelopment) show that PCBs are present at the Site above the established cleanup level. EPA will approve Amendments #3, 5, 6, 7, and 8 in future letters. See Section D of the enclosed Approval for a summary of the approval status of all submitted documents.

Non-PCB contaminants

EPA understands that Chevron is also working with the Orange County Health Care Agency ("OCHCA") and the Santa Ana Regional Water Quality Control Board ("SARWQCB") on cleaning up other contaminants at the Site, such as arsenic, dioxins and furans, and nitrates. These contaminants are not necessarily co-located with PCB contaminated soils, and EPA clarifies that this approval exclusively covers the cleanup of PCBs and not the other contaminants.

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We look forward to assisting you with the implementation of the Revised SMSAP, as well as with activities covered by other Amendments to the SMSAP that have not yet been approved. Please call Nathan Dadap at 415-972-3654 if you have any questions concerning this approval.

Sincerely,



Arlene Kabei
Associate Director
Waste Management Division

Enclosure

cc w/ Enclosure (e-mail only): Jim Martinez, Chevron
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**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105**

May 7, 2012

**EPA Conditional Approval for Risk-Based PCB Cleanup
under the Toxic Substances Control Act, 40 C.F.R. § 761.61(c)
at Birch Hills Golf Course, Brea, California**

A. Introduction

On November 18, 2011, the U.S. Environmental Protection Agency Region 9 ("EPA") received the "Soil Management and Sample and Analysis Plan, Birch Hills Golf Course, 2250 East Birch Street, Brea, California" ("SMSAP"). The SMSAP was prepared by URS Corporation ("URS") for the Chevron Land and Development Company ("Chevron"), which is supporting the current land owner, Union Oil Company of California.

Following discussions between EPA and Chevron/URS regarding deficiencies of the SMSAP, URS has submitted eight Amendments to the SMSAP. The SMSAP and Amendments provide information for additional characterization sampling, specifications for on-site consolidation and temporary soil stockpiling areas, and the cleanup of polychlorinated biphenyls ("PCBs") at the Birch Hills Golf Course in Brea, California ("Site"). A summary of the Amendments submitted to date can be found in Table 1 of Section D at the end of this document.

This Approval only addresses the Revised SMSAP (which includes Amendments #1 and #4). EPA hereby approves these submissions, effective on the date of this enclosure, with conditions. This Approval is issued under the Toxic Substances Control Act ("TSCA") regulatory requirements for a risk-based cleanup of PCBs under 40 C.F.R. § 761.61(c); EPA considers the Revised SMSAP to be the 'Application' that is required in this section of the TSCA regulations. Section C of this document contains the conditions of approval.

B. Site Background

1. Former Land Use and Possible Sources of PCB Contamination

The Birch Hills Golf Course (Site) covers approximately 92 acres of land in Brea, CA. It is divided roughly into Northern and Southern halves by a regional stormwater diversion channel called the Loftus Channel. From the 1950s to the 1990s, a Unocal Chemical Plant (a fertilizer production facility) operated on the southeastern quadrant of the Site. The footprint of the plant also extended further south of the Site into an area that was redeveloped into a shopping center. While an exact source for the PCB contamination is unknown, potential sources include transformers, hydraulic equipment, and building materials. Due to insufficient PCB analyses during closure and demolition of the plant that would have forewarned the presence of PCBs, contaminated soils were spread around the Site when the golf course was being developed. Aroclors 1254 and 1260 are the predominant Aroclors detected at the Site.

2. Future Land Use

Chevron has proposed redevelopment at the Site that would include the construction of two housing developments in areas referred to as Planning Areas 12A and 12B ("PA 12A" and "PA 12B," respectively). The portions of land that will remain a golf course will be renovated and transferred to the City of Brea. A new Community Center will also be constructed in the northern part of the Site. A capped consolidation area for contaminated soils is planned for construction in the Northern Golf Course.

3. Summary of Work to Date

The following bullet points summarize the remediation activities to date that have been accomplished by Chevron/URS at the Site:

- Initial site-wide sampling prior to EPA's involvement
- Additional surface soil sampling in PA 12A
- Additional characterization sampling in the Northern and Southwestern Golf Course
- Sampling in the planned Consolidation Area in the Northern Golf Course
- Grading of PA 12A for redevelopment
- Submission of SMSAP Amendments for EPA approval

C. EPA Conditions of Approval

This conditional approval does not relieve the owner, Union Oil Company of California, and supporting companies Chevron Land Development Company and URS Corporation, from complying with all other applicable federal, state, and local regulations and permits. Departure from the approval conditions without prior written permission from EPA may result in the commencement of proceedings to revoke this approval, and /or an enforcement action. Nothing in this approval bars EPA from imposing penalties for violations of this approval or for violations of other applicable TSCA PCB requirements or for activities not covered under this approval.

This approval only applies to the Birch Hills Golf Course which is the subject of this approval. EPA reserves the right to require additional characterization and / or cleanup of PCBs at the Site if new information during additional Site characterization, cleanup verification, and / or during future post-cleanup activities (e.g., redevelopment and post redevelopment) at the property shows that PCBs remain at the Site above the approved PCB cleanup level. In addition, EPA may require cleanup in areas immediately adjacent to the Site if those areas are found to be impacted by PCBs from the Site.

EPA is hereby approving the Revised SMSAP as modified by the conditions of approval. Unocal/Chevron/URS must implement the Revised SMSAP as modified by the approval conditions established below.

Conditions and Comments of Approval

1. Section 1.1, Element 1, Second Bullet, Remediation waste disposal.

Conditions:

As agreed, Chevron/URS will not dispose of soils contaminated with PCBs via "off-site thermal processing and soil recycling" unless Chevron/URS can demonstrate that such a facility has no PCB emissions above risk-based levels. All soils with PCB levels equal to or above 50 mg/kg shall be removed from the Site via excavation and disposed of offsite as PCB remediation waste, as described in the Revised SMSAP (risk-based cleanup application). All PCB remediation waste must be disposed of in accordance with the requirements in 40 C.F.R. § 761.61(a)(5).

Comment/Clarification:

Chevron/URS have proposed to dispose of soils contaminated with PCBs below 50 mg/kg in a planned onsite Consolidation Area in the Northern Golf Course. EPA will review Amendment #3, "*Remedial Alternative Evaluation*" and Amendment #6, "*Northern Consolidation Area Design*" for approval.

2. Section 2.1, Soil Screening Criteria.

Conditions:

In the absence of a site-specific cleanup level determined through a risk assessment and approved by EPA, default EPA Regional Screening Levels ("RSLs") in soil will be set as the cleanup levels for the Site. For residential and industrial/commercial land use redevelopment these RSLs are 0.22 mg/kg and 0.74 mg/kg, respectively.

Comment/Clarification:

In Section 2.1 of the SMSAP, Chevron/URS propose a cleanup goal of 7 mg/kg for all areas of the Site that will remain a golf course. However, this cleanup goal does not account for all potential receptors at the Site. As discussed, Chevron/URS has submitted Amendment #7, "*Risk Receptor Revisions*" to the Revised SMSAP that accounts for other potential Site receptors and proposes a new cleanup level. Therefore, EPA is not approving Section 2.1 of the SMSAP and any other references to the aforementioned screening criteria therein. Instead, EPA will review Amendment #7 and work with Chevron/URS to finalize a PCB cleanup level for the golf course.

3. Section 1.1, Element 2, First Bullet, Extent of excavation in PA 12B.

Condition:

Characterization sampling, excavation of contaminated soils, and cleanup verification sampling activities in PA 12B must be concluded before geotechnical work is conducted in that area.

Comment/Clarification:

Based on discussions with Chevron/URS, EPA understands that an initial excavation will occur to 10 feet below final grade for all soils in PA 12B, not only for areas with concentrations exceeding a threshold level as described in Section 1.1 of the Revised SMSAP. As discussed, Chevron/URS have submitted Amendment #5, "*Planning Area 12B Soil Excavation and Deep Soil Sample and Analysis Plan*" which addresses post-excavation sampling.

4. Institutional Controls.

Conditions:

If EPA determines that cleanup goals cannot be met at any location throughout the Site (e.g., greater than 10 feet below final grade in PA 12B), Chevron must implement institutional controls for that area that would prevent exposure to contaminated soils. Please submit within 45 days of receipt of this Approval an amendment to the SMSAP with a proposal for the incorporation of institutional controls at the Site.

Comment/Clarification:

EPA understands that Chevron/URS are currently considering various cleanup options in PA 12B and the Southwestern portion of the golf course. As mentioned in Section 1.1, Element 2, Second Bullet, contaminants in PA 12B will "not be disturbed or encountered by Site receptors in the future." If unrestricted use cleanup levels are not met anywhere at the Site, appropriate Institutional Controls (restrictive covenant) must be used to prevent exposure to future site receptors. The language in the institutional control instrument would be subject to EPA review and approval.

5. Section 1.1, Element 2, Third bullet, Consolidation area cap.

Conditions:

Any cap used for the planned Consolidation Area must be accessible for monitoring, maintenance, and repair. The entire Consolidation Area must be covered by a cap that at a minimum meets the requirements in 40 C.F.R. § 761.61(a)(7). A restrictive covenant must include the information in 40 C.F.R. § 761.61(a)(8) and any other information that EPA may specify, and shall be submitted to EPA for review within 60 days after completing the PCB cleanup.

Comment/Clarification:

10 feet of backfill soil may not be necessary in areas of the planned Consolidation Area that will be covered by a cap (e.g., asphalt). Chevron/URS may propose an alternate thickness for the soil barrier proposed for installation beneath the cap. As discussed, Chevron/URS have submitted Amendment #6, "*Northern Consolidation Area Design*" that addresses the Consolidation Area and cap design. EPA will review and approve this Amendment in a separate letter.

6. Section 1.1, Element 2, Second and Fourth bullets, Other Contaminants.

Comment/Clarification:

Remediation of other contaminants such as arsenic, dioxins, and furans are not covered by this Approval and the Orange County Health Care Agency ("OCHCA") has the regulatory lead for these contaminants. The Santa Ana Regional Water Quality Control Board ("SARWQCB") is responsible for the remediation of nitrates in groundwater at the Site.

7. Section 1.3.5, Environmental Setting/Ecological Considerations.

Condition:

Any soils found to be contaminated with PCBs at concentrations above the cleanup level in any portion of the Site must be managed either through offsite disposal, onsite consolidation with a cap, or left in place and managed with the appropriate institutional controls.

Comment/Clarification:

EPA does not consider a "turf/vegetation or hardscape" cover to be a remedy that would reduce exposure to human and ecological receptors. If EPA determines that leaving PCB contaminated soils in place is protective, EPA and Chevron/URS must agree to the details of such option. Refer to Condition 5 of this Approval regarding the requirements for a cap.

8. Section 1.4.5, Soil Assessment – Current – 2010 to 2011, PCB analysis.

Condition:

All future PCB soil analysis results must be reported as dry weight and analyzed using EPA Method 8082A or latest revision after extraction via EPA Method 3540C.

Comment/Clarification:

As noted in EPA's February 2, 2012 letter regarding the PA 12A Sampling Plan, 40 C.F.R. § 761 Subpart N allows for the use of Extraction Methods 3540C (Soxhlet) or 3550B (sonication). However, EPA's preferred extraction method is Method 3540C since it has been our experience that the extraction performance of Method 3550B varies depending on the laboratory.

9. Section 1.4.5.4, Dioxin/Furan Results.

Comment/Clarification:

OCHCA is in charge of assessing PCB and dioxin co-location results. EPA has the regulatory lead for PCB site characterization and cleanup. However, OCHCA is overseeing similar activities associated with non-PCB contaminants such as dioxins and furans. Disposal of soils containing PCBs and dioxins should be in accordance with the most stringent and applicable disposal requirements. This issue will be further addressed in EPA's approval of Amendments #3 and #6 for the Consolidation Area.

10. Section 1.4.5.6, Data Sufficiency for PCBs, Arsenic, Nitrates, and Other Metals.

Amendments #1 and #4 replace Section 1.4.5.6 of the Revised SMSAP. Chevron has completed additional characterization sampling as proposed in Documents 1a, 1c, and 1d, which contain sampling and analysis plans for PA 12A, the Northern Golf Course, and the Southwestern Golf Course, respectively.

i. PA 12A.

Comment/Clarification:

EPA's April 20, 2012 letter determined that additional characterization is not necessary in PA 12A, subject to the conditions established in that letter. Please refer to that letter for more details.

ii. Northern Golf Course.

EPA Determination:

Based on the information in the "*Northern Golf Course Surface Soil Sample and Analysis Plan*," dated March 12, 2012, EPA believes that additional soil characterization is not necessary at this time. However, EPA retains its authority under TSCA to require further soil characterization and cleanup of PCBs in the Northern Golf Course if at any time during grading, construction, and/or post-redevelopment PCBs are found. If PCBs are found, the owner of the property must notify EPA of such finding. EPA will provide assistance with the management of any soils that may be contaminated with total PCBs above EPA's RSL of 0.22 mg/kg or a revised RSL that may be available at the time of such finding.

Chevron/URS is conducting further sampling in the Consolidation Area where soils will be excavated and used as clean fill in planned residential area PA 12B. Chevron's/URS' Amendments #2, "*Clean Fill Data and Proposed Sampling Plan*" and #2a, "*Update to the Clean Fill Data and Proposed Sampling Plan*," which cover the proposed sampling, were submitted on April 13, 2012 and April 19, 2012, respectively, and approved by EPA in an April 20, 2012 letter.

Comment/Clarification:

According to Chevron/URS, additional sampling in the Northern Golf Course was carried out as described in the March 12, 2012 Northern Golf Course sampling plan. EPA acknowledges receipt of this sampling plan which did not include any further sampling activities in PA 12A. The sampling distribution was informed by discussions during meetings between Chevron/URS and EPA staff on March 1 and 8, 2012. However, the sampling took place on March 12 and 21, 2012, prior to EPA review and approval of the sampling plan.

Chevron/URS submitted the "*Northern Golf Course Surface Soil Sample Report*" (Document 1e) as part of Amendment #4 to the Revised SMSAP. This report

summarizes sampling activities and soil analysis results. EPA has compared the soil analysis results to the EPA RSL of 0.22 mg/kg for unrestricted land use. Only one sample result (0.27 mg/kg) in the southwestern corner of the Northern Golf Course exceeded the RSL and these results are also well below the RSL for industrial / commercial land use of 0.74 mg/kg.

iii. Southwest Golf Course.

EPA Determination:

The analytical results for samples collected in the Southwestern Golf Course support the need for additional characterization in that portion of the site. Pending further discussion, EPA will not approve any soil disturbing activities including excavation and grading in the Southwestern Golf Course.

Comment/Clarification:

According to Chevron/URS, additional sampling in the Southwestern Golf Course was conducted as described in the "*Southwestern Golf Course Sample and Analysis Plan*," dated March 16, 2012. The proposed sampling distribution was informed by discussions during meetings between Chevron/URS and EPA staff on March 1 and 8, 2012. However, the sampling activities were performed and completed prior to EPA's review and approval of the sampling plan.

iv. PA 12B.

Comment/Clarification:

On April 26, 2012, EPA received Chevron's/URS' Amendment #5, "*Planning Area 12B Soil Excavation and Deep Soil Sample and Analysis Plan*," which provides a sampling plan for PA 12B. EPA is currently reviewing this Amendment and will approve it in a separate letter.

11. Sections 2.2 and 2.3, Soil Excavation.

Condition:

Within 45 days of receipt of this Approval, Chevron/URS must submit an amendment to the Revised SMSAP that incorporates plans to complete additional site characterization and cleanup of PCBs in the Southwestern Golf Course. EPA will work with Chevron/URS to develop a proposal to adequately characterize that portion of the Site.

Comments/Clarifications:

During an April 16, 2012 conference call, Chevron/URS informed EPA of the soil sampling results in the Southwestern Golf Course. PCBs were detected at levels both above and below 50 mg/kg (up to ~400 mg/kg). The analysis results support the need for additional characterization and furthermore, reinforce a conceptual site model in which soils contaminated with PCBs at the original Union Oil facility were spread around the southern portion of the Site (south of the Loftus Channel) during grading and redevelopment activities.

This conceptual site model assumes that contamination could be present anywhere in the southern portion of the Site and may exist in 6-inch layers – potentially consistent with grading operations at the Site. As proposed, excavation before additional characterization sampling appears to rely on an assumption that contamination is limited to already known areas of contamination; EPA believes that further characterization should be conducted before Chevron/URS implement excavation plans and conduct cleanup confirmation sampling in the Southwestern Golf Course.

EPA will review for approval Chevron's/URS' Amendment #8, "*Soil Management During Excavation and Equipment Decontamination*," which provides a table for the approximate excavation dimensions in the Southwestern Golf Course. However, EPA at this time is not approving Sections 2.2 and 2.3 of the Revised SMSAP. These sections will be considered for approval together with Amendment #8 in a separate letter.

12. Section 2.4, Soil Excavation in PA 12B.

Conditions:

Excavated soils from PA 12B shall not be used as backfill at other parts of the Site unless the entire PA 12B has been characterized to demonstrate that PCB contamination does not exist in that parcel above an EPA approved cleanup level. Due to the heterogeneous distribution of PCBs in the southern portion of the Site, a higher density of characterization samples would be necessary to make such demonstration, as discussed in conference calls between EPA and Chevron/URS. In addition, geotechnical work may not be performed on soils deeper than the initial 10-foot-below-final grade excavation until the cleanup level in that area is met.

Comment/Clarification:

EPA approves the plan to excavate soils 10 feet below final grade within the entire boundary of PA 12B. However, Amendments #3 and #6 are also associated with any excavation at the Site since they relate to the Consolidation Area design. Chevron/URS shall not proceed with excavation until those Amendments have been approved by EPA.

13. Section 3.7, Backfill and Compaction.

Condition:

Backfill for PA 12B must be limited to soils from the Consolidation Area in the Northern Golf Course after sampling in that Area is completed consistent with Amendments #2 and #2a as approved by EPA and results demonstrate that PCBs are not present in those soils above 0.22 mg/kg.

14. Section 3.8, Equipment Decontamination.

Conditions:

Chevron/URS must decontaminate sampling tools and equipment, and movable equipment being used at the Site in accordance with 40 C.F.R. § 761.79(c)(2). This decontamination must be conducted each time samples are collected to prevent cross-contamination.

Decontamination residues must be disposed of at their original concentration in accordance with the requirements in 40 C.F.R. § 761.79(g). Recordkeeping of the decontamination events must be maintained in accordance with the requirements in 40 C.F.R. § 761.79(f)(2). These procedures must be implemented in a manner that is protective of human health and the environment consistent with the requirements in 40 C.F.R. § 761.79(e).

Comments/Clarifications:

EPA understands that Chevron/URS used decontamination procedures different than those in the TSCA PCB regulations when it performed sampling at the Site both before EPA's involvement and when additional sampling was conducted in the Northern and Southwestern Golf Courses (Amendment #1). Chevron/URS may propose an alternative decontamination procedure for EPA approval under 40 C.F.R. § 761.79(h), and this proposal requires a pilot study to test the effectiveness of the procedure. EPA will review for approval Chevron's/URS' alternative decontamination procedure and supporting pilot study in Amendment #8.

15. Section 3.12, Project Schedule.

Comments/Clarifications:

While the schedule in Section 3.12 of the Revised SMSAP is outdated, EPA appreciates Chevron/URS' patience in working with the regulatory agencies to remediate PCB contaminated soils in a timely manner.

16. Section 3.13, Soil Closure Report.

Condition:

A soil closure report shall be submitted to EPA with references to the SMSAP and all subsequent Amendments within 60 days of the conclusion of remediation work at the site. EPA will provide guidance on the contents of this report at a later date.

D. Sections of the Revised SMSAP and Amendments not covered by this approval

The following sections of the Revised SMSAP are not covered by this approval:

1. Section 1.1, Scope of Work, Element 2, Bullet. This section has been replaced by Amendments #2, #2a, and #6
2. Section 2.0, Introductory text. This section has been replaced by Amendment #3.
3. Section 2.1, Soil Screening Criteria and Appendix G, Preliminary Risk Screening Criteria Development for PCBs. These sections have been replaced by Amendment #7.
4. Section 2.4, Soil Excavation for PCBs within PA 12B with On-site Consolidation. This section has been replaced by Amendment #5.
5. Section 3.2, Health and Safety. EPA does not regulate health and safety procedures.
6. Section 3.4, Soil Management During Excavation and Section 3.8, Equipment Decontamination. These sections have been replaced by Amendment #8.

The following sections of the SMSAP and Amendments will be approved at a later date:

7. Section 2.2, Soil Excavation with Off-Site Disposal at GS-144
8. Section 2.3, Soil Excavation for PCBs with Off-Site Processing/Recycling
9. Amendments #3, 5, 6, 7, and 8

In addition, Table 1 (Summary of Submitted Documents) below summarizes the approval status of all documents submitted by Chevron/URS to date.

Table 1. Summary of Submitted Documents

Date Submitted	Document Title	SMSAP Section Replaced	Status
11/18/11	Soil Management and Sample and Analysis Plan, Birch Hills Golf Course, 2250 East Birch Street, Brea, California	<i>Not Applicable</i>	<i>This Approval</i>
4/11/12	Amendment #1 for Documents 1a through 1d	Section 1.4.5.6: Data Sufficiency for PCBs, Arsenic, Nitrate, and Other Metals	
1/20/12	• Document 1a – URS Surface Soil Sample and Analysis Plan – Planning Area 12A		<i>Approved on 2/2/12</i>
3/26/12	• Document 1b – URS Surface Soil Sample Report – Planning Area 12A		<i>Addressed on 4/20/12</i>
3/12/12	• Document 1c – URS Surface Soil Sample and Analysis Plan – Northern Half of the Golf Course		<i>This Approval</i>
3/16/12	• Document 1d – URS Shallow Soil Sample and Analysis Plan – Southwestern Portion of the Golf Course		<i>This Approval</i>
4/13/12	Amendment #2, Clean Fill Data and Proposed Sampling	Section 1.1, Element 2, 3 rd Bullet	<i>Approved on 4/20/12</i>
4/19/12	Amendment #2a, Update to the Clean Fill Data and Proposed Sampling Plan		<i>Approved on 4/20/12</i>
4/12/12	Amendment #3, Remedial Alternative Evaluation	Section 2.0, Introductory text	<i>Under review</i>
4/18/12	Amendment #4, URS Surface Soil Sample Report – Northern Golf Course (“Document 1e” submitted 4/5/12)	Section 1.4.5.6: Data Sufficiency for PCBs, Arsenic, Nitrate, and Other Metals	<i>This Approval</i>
4/24/12	Amendment #5, Planning Area 12B Soil Excavation and Deep Soil Sample and Analysis Plan	Section 2.4: Soil Excavation for PCBs within Planning Area 12B with On-site Consolidation	<i>Under Review</i>
4/25/12	Amendment #6, Northern Consolidation Area Design	Section 1.1, Element 2, 3 rd Bullet	<i>Under Review</i>
4/26/12	Amendment #7, Risk Receptor Revisions	Section 2.1: Soil Screening Criteria and Appendix G: Preliminary Risk Screening Criteria Development for PCBs	<i>Under Review</i>
4/27/12	Amendment #8, Soil Management During Excavation and Equipment Decontamination	Section 3.4: Soil Management During Excavation and Section 3.8: Equipment Decontamination	<i>Under Review</i>